

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BOARHEAD FARM AGREEMENT GROUP,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil Action No. 02-3830
	:	
ADVANCED ENVIRONMENTAL	:	
TECHNOLOGY CORPORATION, ET AL.,	:	
	:	
Defendants.	:	

**STIPULATION**


Plaintiff Boarhead Farm Agreement Group and the undersigned Defendants hereby stipulate as follows:

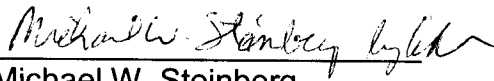
1. The undersigned Defendants, each of whom filed or joined in the Joint Motion of Certain Defendants to Dismiss the Complaint for Failure to State a Claim, hereby withdraw said motion because the allegations in the Second Amended Complaint, when taken as true pursuant to Rule 12(b), make out the standing of Plaintiff to bring this action as the real party in interest.
  
2. Defendants may serve Plaintiff with notices of deposition pursuant to Rule 30 seeking the attendance of witnesses identified with, or designated pursuant to Rule 30(b)(6) by, one or more of the five member companies of Plaintiff ("the Members").
  
3. Interrogatories served on Plaintiff pursuant to Rule 33 will be responded to based upon information available to Plaintiff and information available to the Members. Interrogatories that are limited in scope to a single Member shall be responded to

separately by such Member. Additionally, responses based upon information available solely to an individual Member shall be verified by such Member.

4. Requests for Production served on Plaintiff pursuant to Rule 34 will be responded to based upon documents in the possession, custody, or control of Plaintiff and upon documents in the possession, custody or control of the Members.

5. Requests for Admissions served on Plaintiff pursuant to Rule 36 will be responded to based upon the reasonable inquiry of Plaintiff and of the Members.

  
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Counsel for Plaintiff  
Boarhead Farm Agreement Group

Counsel for Defendant Novartis Corporation ,  
and, for purposes of this Stipulation only,  
Counsel for Defendants Advanced  
Environmental Technology Corporation,  
Ashland Inc., designated by Plaintiff as  
Ashland Chemical Corporation, Carpenter  
Technology Corporation, Emhart Industries  
Inc., Knoll, Inc., Merit Metal Products  
Corporation, NRM Investment Company,  
Plymouth Tube Company, Rahns Specialty  
Metals, Inc., Rohm and Haas Company, Simon  
Wrecking Co., Inc., Techalloy Co., Inc.,  
Thomas & Betts Corporation, and Unisys  
Corporation.

Date: March 17, 2003

**CERTIFICATE OF SERVICE**

I hereby certify that, on March 18, 2003, the foregoing Stipulation was filed electronically and is available for viewing and downloading from the Electronic Case Filing System of the United States District Court for the Eastern District of Pennsylvania. In addition, a true and correct copy of the foregoing Stipulation was served by first-class mail, postage prepaid, upon the following:

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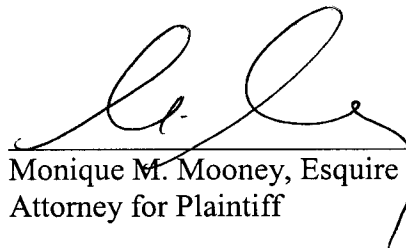
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